

SCOTT
+
SCOTT

PATRICK+COUGHLIN

+ Via ECF +

February 27, 2025

The motion to cancel the hearing scheduled for March 17, 2025 is denied. SO ORDERED.

Dated: February 28, 2025
New York, New York

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

Honorable John G. Koeltl
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Okla. Firefighters Pension and Ret. Sys. v. Deutsche Bank Aktiengesellschaft, et al., No. 1:23-cv-05095

Dear Judge Koeltl:

On January 22, 2025, Plaintiff submitted a motion for preliminary approval of its amended settlement with Defendants Citigroup Global Markets Limited, Citigroup Global Markets Inc., HSBC Bank plc, HSBC Securities (USA) Inc., RBC Europe Limited, RBC Capital Markets, LLC, Morgan Stanley & Co. International plc, and Morgan Stanley & Co. LLC (collectively, “Settling Defendants”). See ECF No. 113. On January 23, 2025, the Court entered an order scheduling a hearing for March 17, 2025, and requiring that any responses and objections to the motion be filed by February 12, 2025 and any replies be filed by February 21, 2025. See ECF No. 117. No party has opposed Plaintiff’s motion for preliminary approval, and the deadline for doing so has now passed.

Given the foregoing and for the reasons stated in Plaintiff’s memorandum in support of the motion, Plaintiff respectfully requests that the Court cancel the hearing scheduled for March 17, 2025 and enter the proposed preliminary approval order. See ECF Nos. 114 & 116. See also *Lizondro-Garcia v. Kefi LLC*, 300 F.R.D. 169, 179 (S.D.N.Y. 2014) (noting “courts often grant preliminary settlement approval without requiring a hearing or a court appearance”) (citations omitted). Pursuant to the schedule set forth in Plaintiff’s motion and the proposed preliminary approval order (see ECF Nos. 115-3 & 116), Plaintiff requests that the Court schedule the final approval hearing no earlier than nine months from entry of the preliminary approval order (e.g., on or after December 17, 2025) so as to provide adequate time for Plaintiff to collect Defendants’ reasonably available counterparty information for purposes of notice to the proposed settlement class.

Counsel for the Settling Defendants consent to Plaintiff’s request. Counsel for non-settling defendants Deutsche Bank Aktiengesellschaft and Deutsche Bank Securities Inc. take no position.

Respectfully submitted,

The Hon. John G. Koeltl
February 27, 2025
Page 2

SCOTT+SCOTT ATTORNEYS AT LAW LLP

s/Patrick Coughlin
PATRICK COUGHLIN
CARMEN MEDICI (admitted *pro hac vice*)
FATIMA BRIZUELA
PATRICK J. RODRIGUEZ
DANIEL J. BROCKWELL (admitted *pro hac vice*)
JONATHAN SMALLWOOD (admitted *pro hac vice*)
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: 619-233-4565
Facsimile: 619-233-0508
pcoughlin@scott-scott.com
cmedici@scott-scott.com
fbrizuela@scott-scott.com
prodriguez@scott-scott.com
dbrockwell@scott-scott.com
jsmallwood@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

KRISTEN M. ANDERSON
DONALD A. BROGGI
MICHELLE E. CONSTON
The Helmsley Building
230 Park Ave., 24th Floor
New York, NY 10169
Telephone: 212-223-6444
Facsimile: 212-223-6334
kanderson@scott-scott.com
dbroggi@scott-scott.com
mconston@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

DAVID R. SCOTT
AMANDA LAWRENCE
156 South Main Street
P.O. Box 192
Colchester, CT 06415
Telephone: 860-537-5537
Facsimile: 860-537-4432
david.scott@scott-scott.com
alawrence@scott-scott.com

*Counsel for Plaintiff Oklahoma Firefighters
Pension and Retirement System, and Proposed
Class Counsel*

cc: All Parties of Record via ECF